

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. DANIEL ALBERT AMATUZIO,
2. KYLE RICHARD BERGMAN,
3. DILLON PHILLIP BEYERS,
4. JEFFREY JAMES BOSHEY,
5. BRAD RODNEY CHRISTOFFERSON,
6. LAWRENCE LALONDE COLTON,  
a/k/a "Lo,"
7. RHONDA ANN DAVIS,
8. RYAN JAMES DRICKHAMER,
9. BRIAN TROY EASTLICK,
10. ZACHARY JOHN HAMEL,
11. JUSTIN PAUL JOHNSON,
12. RINDI KAY KOENEN,
13. JOHNNIE LEE LEDDELL,
14. JEFFREY LAMONT LIDDELL,  
a/k/a "Jy General,"  
a/k/a "J.G.,"  
a/k/a "Little Jeff,"
15. VERONIQUE ZSAZSAANTIQUE MUCKLE,  
a/k/a "Nique Nique,"
16. JACOB KEITH NAGLE,
17. BRIAN KEITH PORTIS,
18. CLETIS BERNARD PORTIS,

INDICTMENT

CR 11-305 DAD/LIB

) (18 U.S.C. § 2)  
) (18 U.S.C. § 924(c))  
) (18 U.S.C. § 924(d))  
) (21 U.S.C. § 841(a)(1))  
) (21 U.S.C. § 841(b)(1)(C))  
) (21 U.S.C. § 846)  
) (21 U.S.C. § 848(a))  
) (28 U.S.C. § 2461(c))

SEP 21 2011

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19. ERIC PHILLIP ROMERO,	)
a/k/a "Big E,"	)
	)
20. SEAN PATRICK SAYLOR,	)
a/k/a "Little Sean,"	)
	)
21. GORDON EUGENE SHARP,	)
	)
22. CAINE RAMUS STARKS,	)
	)
23. IAN PHILLIP STAUBER,	)
	)
24. DANIEL ALLEN STENZEL,	)
	)
25. ANGELIQUE MICHELLE VOS,	)
	)
26. KRYSTAL LYNN WILLIS, and	)
	)
27. NICOLAS ZANE WORLEY,	)
	)
Defendants.	)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Continuing Criminal Enterprise)

Beginning in or about 2010, and continuing through in or about September 2011, in the State and District of Minnesota, and elsewhere, the defendant,

JEFFREY LAMONT LIDDELL,  
    a/k/a "Jy General,"  
    a/k/a "J.G.,"  
    a/k/a "Little Jeff,"

did unlawfully, knowingly and intentionally engage in a continuing criminal enterprise, in that he unlawfully, knowingly and intentionally violated Title 21, United States Code, Sections 841(a)(1), which violations include, but are not limited to, the



substantive felony violations alleged in Counts 26, 37, 38, 41, 42, and 43, which Counts are realleged and incorporated herein by reference as though fully set forth in this Count, and which violations were part of a continuing series of violations of the Controlled Substance Abuse Act, Title 21, United States Code, Section 801, et. seq., undertaken by the defendant in concert with at least five other persons with respect to whom the defendant occupied a position of organizer, supervisor, and/or any position of management, and from which such continuing series of violations the defendant obtained substantial income and resources, in violation of Title 21, United States Code, Section 848(a).

COUNT 2

(Conspiracy to Distribute Oxycodone, Oxymorphone and Heroin)

Beginning in or about 2010, and continuing through in or about September 2011, in the State and District of Minnesota and elsewhere, the defendants,

DANIEL ALBERT AMATUZIO,  
KYLE RICHARD BERGMAN,  
DILLON PHILLIP BEYERS,  
JEFFREY JAMES BOSHEY,  
BRADLEY RODNEY CHRISTOFFERSON,  
LAWRENCE LALONDE COLTON,  
a/k/a "Lo,"  
RHONDA ANN DAVIS,  
RYAN JAMES DRICKHAMER,  
BRIAN TROY EASTLICK,  
ZACHARY JOHN HAMEL,  
JUSTIN PAUL JOHNSON,  
RINDI KAY KOENEN,



JOHNNIE LEE LEDDELL,  
JEFFREY LAMONT LIDDELL,  
a/k/a "Jy General,"  
a/k/a "J.G.,"  
a/k/a "Little Jeff,"  
VERONIQUE ZSAZSAANTIQUE MUCKLE,  
a/k/a "Nique Nique,"  
JACOB KEITH NAGLE,  
BRIAN KEITH PORTIS,  
CLETIS BERNARD PORTIS,  
ERIC PHILLIP ROMERO,  
a/k/a "Big E,"  
SEAN PATRICK SAYLOR,  
a/k/a "Little Sean,"  
GORDON EUGENE SHARP,  
CAINE RAMUS STARKS,  
IAN PHILLIP STAUBER,  
DANIEL ALLEN STENZEL,  
ANGELIQUE MICHELLE VOS,  
KRYSTAL LYNN WILLIS,  
and  
NICOLAS ZANE WORLEY,

did unlawfully, knowingly and intentionally conspire with each other and with others, known and unknown to the grand jury, to distribute mixtures and substances containing detectable amounts of oxycodone, oxymorphone, and heroin, all controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 846.



**COUNTS 3-10**

(Possession With Intent to Distribute  
Oxycodone, Oxymorphone, Hydrocodone, and Heroin)

On or about the dates and in the amounts set out below, in the State and District of Minnesota, and elsewhere, the defendants named below did unlawfully, knowingly and intentionally possess with intent to distribute, and aided and abetted the unlawful, knowing and intentional distribution of mixtures and substances containing detectable amounts of oxycodone, oxymorphone, hydrocodone, and heroin, all controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count	On or About	Defendant(s)	Possessed
3	08/17/2010	KYLE RICHARD BERGMAN	Oxycodone and Hydrocodone
4	10/20/2010	DANIEL ALBERT AMATUZIO and NICOLAS ZANE WORLEY	Oxycodone
5	12/21/2010	SEAN PATRICK SAYLOR	Oxymorphone and Heroin
6	03/02/2011	IAN PHILIP STAUBER	Oxymorphone
7	03/17/2011	JUSTIN PAUL JOHNSON	Oxymorphone
8	03/29/2011	JOHNNIE LEE LEDDELL	Oxycodone, Oxymorphone, and Hydrocodone
9	07/18/2011	KYLE RICHARD BERGMAN	Oxymorphone
10	08/25/2011	KRYSTAL LYNN WILLIS	Oxymorphone



**COUNTS 11-70**

(Distribution of Oxycodone, Oxymorphone  
Hydrocodone and Heroin)

On or about the dates set forth in the transactions set out below, in the State and District of Minnesota and elsewhere, the defendants did unlawfully, knowingly and intentionally distribute, and aided and abetted the unlawful, knowing and intentional distribution, of mixtures and substances which contained detectable amounts of oxycodone, oxymorphone, hydrocodone, and heroin, all controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18 United States Code, Section 2.

Count	On or About	Defendant(s)	Distributed
11	10/04/2010	JACOB KEITH NAGLE	Oxymorphone
12	10/06/2010	KYLE RICHARD BERGMAN	Oxymorphone
13	10/19/2010	JACOB KEITH NAGLE	Oxymorphone
14	11/08/2010	DANIEL ALBERT AMATUZIO	Oxymorphone
15	11/10/2010	BRIAN TROY EASTLICK	Oxymorphone
16	11/23/2010	RYAN JAMES DRICKHAMER	Oxycodone
17	12/13/2010	VERONIQUE ZSAZSAANTIQUE MUCKLE	Oxymorphone
18	12/13/2010	RYAN JAMES DRICKHAMER	Oxymorphone
19	12/14/2010	ERIC PHILLIP ROMERO	Oxymorphone
20	12/15/2010	JUSTIN PAUL JOHNSON	Oxymorphone
21	12/22/2010	ERIC PHILLIP ROMERO	Oxymorphone
22	02/01/2011	ERIC PHILLIP ROMERO	Oxymorphone



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23	02/03/2011	IAN PHILIP STAUBER	Oxymorphone
24	02/17/2011	IAN PHILIP STAUBER	Oxymorphone
25	03/02/2011	IAN PHILIP STAUBER	Oxymorphone
26	03/09/2011	JEFFREY LAMONT LIDDELL	Oxymorphone
27	03/17/2011	ANGELIQUE MICHELLE VOS	Oxymorphone
28	03/23/2011	ANGELIQUE MICHELLE VOS	Oxymorphone
29	03/28/2011	JOHNNIE LEE LEDDELL	Oxymorphone
30	03/28/2011	RINDI KAY KOENEN	Oxymorphone
31	04/12/2011	ZACHARY JOHN HAMEL	Oxymorphone
32	04/14/2011	ZACHARY JOHN HAMEL	Heroin
33	04/19/2011	CAINE RAMUS STARKS	Oxycodone and Oxymorphone
34	04/22/2011	CAINE RAMUS STARKS and RHONDA ANN DAVIS	Oxycodone
35	04/25/2011	CAINE RAMUS STARKS	Oxycodone and Hydrocodone
36	04/25/2011	VERONIQUE ZSAZSAANTIQUE MUCKLE and ZACHARY JOHN HAMEL	Oxymorphone
37	04/29/2011	JEFFREY LAMONT LIDDELL	Oxymorphone
38	05/05/2011	JEFFREY LAMONT LIDDELL	Oxymorphone
39	05/06/2011	JACOB KEITH NAGLE	Oxymorphone
40	05/10/2011	CAINE RAMUS STARKS and RHONDA ANN DAVIS	Oxycodone
41	05/12/2011	JEFFREY LAMONT LIDDELL	Oxymorphone
42	05/13/2011	JEFFREY LAMONT LIDDELL	Oxymorphone
43	05/23/2011	JEFFERY LAMONT LIDDELL	Oxymorphone
44	06/01/2011	CAINE RAMUS STARKS	Oxymorphone
45	06/06/2011	CAINE RAMUS STARKS	Oxymorphone



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46	06/13/2011	BRAD RODNEY CHRISTOFFERSON and GORDON EUGENE SHARP, JR.	Oxymorphone
47	06/15/2011	BRAD RODNEY CHRISTOFFERSON and GORDON EUGENE SHARP, JR.	Oxymorphone
48	06/21/2011	JACOB KEITH NAGLE and GORDON EUGENE SHARP, JR.	Oxymorphone
49	06/21/2011	DILLON PHILLIP BEYERS	Oxymorphone
50	06/23/2011	GORDON EUGENE SHARP, JR.	Oxymorphone
51	06/24/2011	GORDON EUGENE SHARP, JR.	Oxymorphone
52	06/27/2011	CAINE RAMUS STARKS	Oxymorphone
53	06/28/2011	DILLON PHILLIP BEYERS	Oxymorphone
54	06/28/2011	GORDON EUGENE SHARP, JR.	Oxymorphone
55	06/29/2011	DILLON PHILLIP BEYERS	Oxymorphone
56	06/29/2011	CAINE RAMUS STARKS	Oxymorphone
57	07/08/2011	GORDON EUGENE SHARP, JR.	Oxymorphone
58	07/11/2011	DANIEL ALLEN STENZEL	Oxymorphone
59	07/12/2011	VERONIQUE ZSAZSAANTIQUE MUCKLE and LAWRENCE LALONDE COLTON	Oxymorphone
60	07/12/2011	DANIEL ALLEN STENZEL	Oxymorphone
61	07/13/2011	VERONIQUE ZSAZSAANTIQUE MUCKLE and CLETIS PORTIS	Oxymorphone
62	07/18/2011	VERONIQUE ZSAZSAANTIQUE MUCKLE	Oxymorphone
63	07/18/2011	DANIEL ALLEN STENZEL	Oxymorphone
64	08/10/2011	JEFFREY JAMES BOSHEY	Oxymorphone
65	08/15/2011	JEFFREY JAMES BOSHEY	Oxymorphone
66	08/18/2011	JEFFREY JAMES BOSHEY	Oxymorphone



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67	08/25/2011	JEFFREY JAMES BOSHEY	Oxymorphone
68	08/29/2011	DANIEL ALLEN STENZEL	Oxymorphone
69	09/6/2011	BRIAN KEITH PORTIS, CLETIS BERNARD PORTIS, AND NICHOLAS ZANE WORLEY	Oxymorphone
70	09/6/2011	LAWRENCE LALONDE COLTON and VERONIQUE ZSAZSAANTIQUE MUCKLE	Oxymorphone

COUNT 71

(Using, Carrying, or Possessing a Firearm  
During and in Relation to a Drug Trafficking Crime)

On or about June 1, 2011, in the State and District of  
Minnesota, the defendant,

**CAINE RAMUS STARKS,**

did knowingly use, carry and possess a firearm, namely one (1)  
Vincenzo Bernardelli 12 gauge, side-by-side shotgun, serial number  
#3398, during and in relation to a drug trafficking crime for which  
he may be prosecuted in a court of the United States, namely Count  
44, which Count is realleged and incorporated herein by reference  
as though fully set forth in this Count, in violation of Title 18,  
United States Code, Section 924(c) (1) (A).



COUNT 72

(Using, Carrying, or Possessing a Firearm  
During and in Relation to a Drug Trafficking Crime)

On or about June 6, 2011, in the State and District of  
Minnesota, the defendant,

**CAINE RAMUS STARKS,**

did knowingly use, carry and possess a firearm, namely one (1) I.O.  
Inc. .380 caliber ACP Hellcat pistol, serial number 04987, during  
and in relation to a drug trafficking crime for which he may be  
prosecuted in a court of the United States, namely Count 45, which  
Count is realleged and incorporated herein by reference as though  
fully set forth in this Count, in violation of Title 18, United  
States Code, Section 924(c)(1)(A).

COUNT 73

(Using, Carrying, or Possessing a Firearm  
During and in Relation to a Drug Trafficking Crime)

On or about June 27, 2011, in the State and District of  
Minnesota, the defendant,

**CAINE RAMUS STARKS,**

did knowingly use, carry and possess a firearm, namely one (1)  
Bersa SA Thunder 380 Model .380 caliber pistol, serial number  
765101, during and in relation to a drug trafficking crime for  
which he may be prosecuted in a court of the United States, namely  
Count 52, which Count is realleged and incorporated herein by



reference as though fully set forth in this Count, in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT 74**

(Using, Carrying, or Possessing a Firearm  
During and in Relation to a Drug Trafficking Crime)

On or about June 29, 2011, in the State and District of Minnesota, the defendant,

**CAINE RAMUS STARKS,**

did knowingly use, carry and possess a firearm, namely One (1) HY Hunter Inc. Firearms Mfg. Co. Frontier Six-Shooter Model .22 caliber revolver, serial number 19125, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely Count 56, which Count is realleged and incorporated herein by reference as though fully set forth in this Count, in violation of Title 18, United States Code, Section 924(c)(1)(A).

**FORFEITURE ALLEGATIONS**

If convicted of any of the Counts 1-70 of this Indictment, the defendants shall forfeit to the United States any property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of each such violations; any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of each such violations; any interest in, claims against, and property or contractual rights affording a



source of control over, the violations alleged in Count 1 of this Indictment; and any substitute for such property under Title 21, United States Code, Section 853(p); all pursuant to Title 21, United States Code, Section 853.

If convicted of any of Counts 71-74 of this Indictment, Defendant CAINE RAMUS STARKS shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c), any firearm with accessories and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 924(c), including but not limited to:

1. One Vincenzo Bernardelli 12 gauge side-by-side shotgun, serial number 3398;
2. One I.O. Inc. .380 caliber ACP Hellcat pistol, serial number 04987;
3. One (1) Bersa SA Thunder 380 Model .380 caliber pistol, serial number 765101;
4. One (1) HY Hunter Inc. Firearms Mfg. Co. Frontier Six-Shooter Model .22 caliber revolver, serial number 19125.

All in violation of Title 18, United States Code, Sections 922(g)(1), 922(j), 924(a)(2) and 924(d)(1) and Title 28, United States Code, Section 2461(C).



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A TRUE BILL

\_\_\_\_\_  
UNITED STATES ATTORNEY

\_\_\_\_\_  
FOREPERSON